

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: ROBERTO Y. GUERRERO DIAZ LUGZA M. PRIETO MARTINEZ DEBTOR(S)	CASE NUMBER: 11-07172 BKT CHAPTER 13 ASSET CASE)
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**DEBTORS REPLY TO TRUSTEE'S MOTION TO DISMISS
AND REQUEST FOR NEW 341 MEETING**

TO THE HONORABLE COURT:

1. On October 3rd, 2011, Trustee filed a Motion to Dismiss based on debtor's failure to attend the 341 meeting.

2. There were several hearings schedule in the present case since debtor filed separate because they are common law spouses and this caused that debtors were confused and failed to appear at the 341 meeting of creditors.

3. Debtors are current with their payments to the Trustee.

4. Based on the abovementioned, it is debtor's contention that Trustee's motion turns into a moot one.

NOTICE

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve

ROBERTO Y. GUERRERO
LUGZA M. PRIETO MARTINEZ
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REPLY MOTION TO DISMISS

and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may - in its discretion - schedule a hearing.

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Trustee's Motion to Dismiss and Order a new 341 meeting be scheduled by the Trustee.

In San Juan, Puerto Rico, this 4th, day of October 2011.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA

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San Juan, PR 00919-5596
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I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

11-07172-13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES
newecfmail@ch13-pr.com

MONSITA LECAROS ARRIBAS
ustpreregion21.hr.ecf@usdoj.gov

MARILYN VALDES ORTEGA on behalf of Debtor
valdeslaw@prtc.net

I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

11-07172-13 Notice will not be electronically mailed to:

BANCO POPULAR DE PUERTO RICO
P.O. BOX 362708
SAN JUAN, PR 00936-2708

CHILDRENS PLACE
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KANSAS CITY, MO 64195

CITIFINANCIAL
PO BOX 70919
CHARLOTTE, NC 28272-0919

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
OFICINA 424 B
SAN JUAN, PR 00902

DEPARTAMENTO DEL TRABAJO
AVE. MUÑOZ RIVERA 505
HATO REY, PR 00918

ECMC
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ST PAUL, MN 55175

FEDERAL LITIGATION DEPT OF JUSTICE
PO BOX 9020192
SAN JUAN, PR 00902-0192

INTERNAL REVENUE SERVICE
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ST LOUIS, MO 63195-3185

LCDA. YIVETTE CARRION DE JESUS
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BAYAMON, PR 00956

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SEARS
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